

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**NOTICE OF NON-OPPOSITION TO AMENDED MOTION FOR
ISSUANCE OF A SUPPLEMENTAL REQUEST FOR JUDICIAL
ASSISTANCE (LETTER OF REQUEST) UNDER THE HAGUE
CONVENTION ON THE TAKING OF EVIDENCE ABROAD IN CIVIL OR
COMMERCIAL MATTERS**

Class Representatives Obasi Investment Limited, Robin Dartell, Lixin Wu, and Sean Carithers (collectively “Plaintiffs”) respectfully submit this notice to inform the Court that the deadline for submitting an opposition to Plaintiffs’ Amended Motion For Issuance of a Supplemental Request for Judicial Assistance (Letter Request) Under the Hague Convention on the Taking of Evidence Abroad In Civil or Commercial Matters, Dkt. 304, expired on December 19, 2017. As of the date of filing of this notice, no opposition or objections have been received or filed. In addition, the relief sought by Amended Motion, that is, issuance of a Supplemental Letter Request under the Hague Convention, will enable the discovery of a key piece of evidence in the case that bears directly on Plaintiffs’ ability to assess their claims against the remaining Defendants in the action.

Therefore, Plaintiffs respectfully request that the Court enter the [Proposed] Order (dkt. 304-3) and issue the Supplemental Letters of Request under the Hague Convention (dkt. 304-2).

Dated: January 15, 2018

THE ROSEN LAW FIRM, P.A.

By: /s Laurence M. Rosen
Laurence M. Rosen, Esq.
609 W. South Orange Avenue, Suite 2P
South Orange, New Jersey 07079
Tel: (973) 313-1887
Fax: (973) 833-0399
Email: lrosen@rosenlegal.com

Sara Fuks, Esq. (*pro hac vice*)
275 Madison Avenue, 34th Floor

New York, New York 10016
Telephone: (212) 686-1060
Facsimile: (212) 202-3827
Email: sfuks@rosenlegal.com

Lead Class Counsel

CERTIFICATE OF SERVICE

I, Sara Fuks, hereby declare under penalty of perjury as follows:

I am attorney with the Rosen Law Firm, P.A., with offices at 609 W. South Orange Avenue, Suite 2P, South Orange, NJ 07079. I am over the age of eighteen.

On January 15, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on January 15, 2018

/s/ *Sara Fuks*